Approved
by the Decision of the Executive Board
of the National Bank of Moldova
No 258 of 6 November 2025

REGULATION
on the receipt, examination and resolution of internal disclosures on law violations within the National Bank of Moldova

I. GENERAL PROVISIONS

1. The Regulation on the receipt, examination and resolution of internal disclosures on law violations within the National Bank of Moldova (hereinafter - *Regulation*) is drafted pursuant to the provisions of Law No 165/2023 on integrity whistleblowers (hereinafter - *Law No 165/2023*).
2. The purpose of this Regulation is to promote and maintain a climate of institutional integrity and to encourage disclosures on law violations. It applies to employees of the National Bank of Moldova (hereinafter - *NBM*), members of the Executive Board and members of the Supervisory Board.
3. The Regulation establishes the method of internal reporting of disclosures within NBM, the procedure for registration in the *Registry of disclosures regarding law violations* (hereinafter - *Registry*), the examination of disclosures, recognition as an integrity whistleblower and the application of protective measures for employees who meet the conditions of point 35.
4. The notions not defined in this Regulation have the meaning provided by Law No 165/2023 and the Integrity Law No 82/2017 (hereinafter - *Law No 82/2017*).
5. For the purposes of this Regulation, the terms and expressions used have the following meanings:
   employee- the natural person who, in the last 12 months:
   a) has or had the status of employee in relation to the NBM, according to the labour legislation, including members of the Executive Board;
   b) has or had the status of volunteer or intern in relation to the NBM;
   c) has or had contractual, civil legal relations with the NBM;
   d) has or had the status of candidate for a vacant position, participating in a hiring competition organised by the NBM;
   e) has or had the status of member of the Supervisory Board.

   *internal disclosure on law violation (*also called *disclosure) -* verbal or written communication of any information regarding a violation of the law that threatens or harms the rights of the person or interests protected by the law, which is made within the NBM by one of the methods listed in point 11.

   facilitator - the employee who assists the integrity whistleblower in the process of disclosing the law violation, in a professional context, whose assistance is confidential.

   the telephone line operator - the person within the Security and Administration Department, appointed through the Governor's order, who is responsible for receiving disclosures made at the specialised anti-corruption hotline of the NBM.
6. The person within the Compliance Division responsible for receiving, registering internal disclosures and undertaking actions to examine them, as well as for keeping *the Registry*, is appointed through the Governor's order (hereinafter - *the designated person).*
7. The employees have the right to make disclosures regarding law violations, to be recognized as integrity whistleblowers and to benefit from protection measures in accordance with the legislation.

II.DISCLOSURE ON LAW VIOLATION

8. The communication of the disclosure is performed through the Internal Disclosure of Law Violation Questionnaire (hereinafter - *the Questionnaire*), according to the model provided in Annex 1, that is completed by the employee or, as the case may be, by the telephone line operator.

9. The disclosure includes, at a minimum, the following: the employee's first and last name and contact details; the subdivision in which they work; the position they hold, the professional context in which the information was obtained; the person concerned in the disclosure, if known; the description of the act likely to constitute a law violation; the evidence supporting the disclosure, if applicable; the date and the signature.

10. A disclosure that does not include the employee's first and last name, their contact details, or signature, but contains reasonable suspicions of threats to national security and public order, is forwarded for examination and resolution to the competent authorities.

11. The disclosure of a law violation can be made:
   1) on paper - by mail, with the mention on the envelope *"for the Compliance Division";*
   2) in electronic format - by completing the Questionnaire in the electronic document management system (EDMS), section "*Compliance Division*";
   3) at the specialised anti-corruption hotline of the NBM (+373 22) 822-501;
   4) within a face-to-face meeting – for which the appointment shall be made through an e-mail to the e-mail address *sesizare@bnm.md* containing the first name and last name, the proposed date and hour of the meeting and the contact details of the sender.

12. In the event that the disclosure is made through the specialised anti-corruption hotline, the telephone line operator, subject to the consent of the employee making the disclosure, shall document the disclosure by fully and accurately transcribing the conversation into minutes (allowing the employee to verify and correct it), along with completing the Questionnaire. The minutes and the completed Questionnaire are submitted to the designated person for review.

13. If the employee making the disclosure does not consent to the recording of the conversation, they are guided by the telephone line operator to report in writing, on paper or in electronic format, according to point 11.

14. If the employee requests the disclosure to be made face-to-face, the designated person is obliged to draw up the minutes containing the records of the conversation, subject to the employee's consent, while the employee will fill in the Questionnaire. The designated person allows the employee to verify, correct and express their consent regarding the drafting of the conversation minutes by signing it.

15. In the process of receiving, recording disclosures, proceeding to examination and resolution measures, the confidentiality of the employee's identity and the information in the *Registry* is ensured. The identity of the employee who discloses law violations, including the information that would allow their direct or indirect identification, is not disclosed to third parties, especially the persons concerned in the disclosure, except the cases when the employee expressed their consent or when a criminal investigation has been initiated based on the disclosure of public interest regarding law violation.

16. The confidentiality and professional secrecy clauses between the NBM and the employee do not impede the disclosure of the violation of the law.

III. REGISTRATION AND EXAMINATION OF DISCLOSURES. RECOGNITION OF THE STATUS OF INTEGRITY WHISTLEBLOWER

17. The designated person ensures the registration of disclosures in the *Registry,* managed in electronic format in EDMS, according to Annex 2.

18. Upon submission of the disclosure by the employee, the designated person shall notify the employee, in writing, via EDMS or e-mail, about the receipt of the disclosure, within 3 working days. In cases when the subject of the disclosure exceeds the competence of the NBM, it shall be

forwarded for examination to other public entities, according to their competences, within 3 working days from the date of its registration in the *Registry*, with the confidentiality being duly ensured.

19. In order to be entered in the *Registry* and to be recognised as an integrity whistleblowing, the disclosure must meet the following conditions:
   1) be reported by one of the methods listed in point 11;
   2) be made by an employee of the NBM;
   3) the disclosed information is obtained in a professional context;
   4) the reported circumstances to constitute a law violation.

20. The registration of the disclosure of the law violation in the *Registry* grants the employee who reported it the status of integrity whistleblower, with the issuance of the stub, provided in Annex 1. The designated person immediately informs the Governor about the registration of the disclosure, but no later than the next working day after it was received.

21. Within 3 months from the date of confirmation of receipt of the disclosure of the law violation, except where informing could affect the examination process, the designated person informs the employee in writing, via EDMS or e-mail, about the stage of examination of the disclosure, and the Governor about the conduct of subsequent actions. If the employee has not been communicated any confirmation of receipt of the disclosure of the law violation, the designated person informs the employee in writing, via EDMS or e-mail, about the stage of examination of the respective disclosure within 3 months from the expiry of the 3-day period from its submission.

22. If the information presented in the disclosure is not confirmed, the designated person drafts a note to the Governor about the findings and the results of the verification, to which the relevant materials are attached, as appropriate.

23. The results of the examination are communicated to the employee who made the disclosure, via EDMS or e-mail, within 3 months from the date of confirmation of receipt of the respective disclosure or, in duly justified cases, within 6 months.

24. In the event that the employee makes multiple disclosures having the same subject matter, these are merged into a single procedure, and the integrity whistleblower shall receive only one notification. If, after the completion of the examination of the integrity whistleblowing, a new disclosure of law violation with the same subject matter is submitted, without additional information justifying different subsequent actions, it shall not be examined, this fact being recorded in the *Registry*, with the notification of the employee.

25. The disclosure of a law violation and the integrity alert cease to be examined when:
   1) the disclosure does not meet the conditions provided in point 19;
   2) after proper examination, it is found that the integrity alert contains clearly insignificant information;
   3) the disclosure is repeatedly submitted without any arguments and additional information that would justify the resumption of subsequent actions;
   4) the disclosure is submitted anonymously and does not contain sufficient information regarding the law violation, in order to allow its examination.

26. Within 5 working days from the date of the decision on cessation of examination of the integrity alert, this fact shall be communicated in writing to the integrity whistleblower, via EDMS or e-mail, indicating the legal basis, except for the situation provided in point 25 subpoint 4).

27. After completing the examination of the integrity alert, the designated person shall prepare a report to the Governor, which includes the following key aspects: a description of the

circumstances that determined the subject of the disclosure, including a description of the information brought to the Governor's attention through the recorded report and, where appropriate, the presentation of conclusions and recommendations which may include references to possible protection measures.

28. The method of resolving the integrity alert shall be communicated in writing, via EDMS or e-mail, to the integrity whistleblower, within 5 days from the completion of its examination.

29. During the examination of the disclosure, the designated person may request additional information from the employee who made the disclosure, within the limits provided by this Regulation.

30. If the disclosure directly concerns the Governor, the members of the Executive Committee and the members of the Supervisory Board, the designated person transmits the respective information to the National Anti-Corruption Centre if the information contained in the alert meets the elements of a contravention or corruption offense, or to the competent authority responsible for managing the area of the alleged law violation. If the disclosure concerns the members of the Executive Board and members of the Supervisory Board, the designated person informs the Governor.

31. The information in the *Registry* and the related materials are kept for 5 years from the date of their issuance, in printed version or in electronic format, under the conditions that would ensure the protection of the information against access, transmission, destruction, alteration, or modification.

IV. PROTECTIVE MEASURES

32. The rules regarding identity protection, applicable to integrity whistleblowers, provided by the Law No 165/2023 and the Law No 82/2017, also apply to facilitators, persons concerned in the disclosures, as well as third parties mentioned in integrity alert. The identity of facilitators, persons concerned in the disclosure, and third parties connected to the integrity whistleblower is protected throughout the subsequent actions.

33. Any form of retaliation against integrity whistleblowers is prohibited, including those provided for in Article 21 of Law No 165/2023.

34. The employee who, in connection with the integrity alert they have made, is affected by retaliation (through actions, inactions, or threats) provoked by other employees or members of the management bodies, has the right to request protection by completing the application form provided in Annex 3.

35. In order to benefit from the protection measures, the following conditions must be cumulatively met:
   1) the integrity alert is made by one of the methods listed in point 11;
   2) the integrity alert is made with reasonable grounds on trustworthy of the information regarding the law violation, at the time of disclosure;
   3) the employee is recognised as an integrity whistleblower according to the provisions set out by this Regulation;
   4) the integrity whistleblower is subject to retaliation;
   5) there is a causal link between the disclosure om the law violation and the alleged retaliation.

36. In order to ensure the application of protection measures for the whistleblower, the Governor:
   1) examines the protection requests of the integrity whistleblowers;
   2) undertakes administrative actions to cease retaliation against the employee, applying the guarantees established by the law, for the protection of the integrity whistleblower.

37. The employee recognised as an integrity whistleblower may benefit from the following protection measures, without being limited to these:
    1) their transfer or the transfer of the person performing retaliatory actions, into another division, during the period of examination of the protection request, with the specific activity being kept, or if not possible - into a subdivision carrying out a related activity, in order to exclude or limit the influence of the person who retaliated in connection with the integrity alert or disclosure of law violations;
    2) sanctioning of the person who retaliated in connection with the integrity alert or disclosure of law violations or, if applicable, sanctioning of the head of the concerned division for failing to ensure protection measures;
    3) invoking the status of integrity whistleblower in the case of disciplinary investigation following the disclosure of a law violation, in which case the disciplinary procedure is suspended until the final resolution of the integrity alert.

38. The designated person will examine, within no more than 15 days, the protection request of the integrity whistleblower and will present to the Governor proposals regarding the approval of the request or the reasons for refusal, subsequently informing of the integrity whistleblower about the examination results. The 15-day term starts on the day the request is registered.

39. The protection granted may be withdrawn in the event of subsequent findings of the following situations:
    1) the communicated information is not truthful, including when it is proven that the employee knew or should have known about the false nature of the content of their disclosure (the disclosure is not made in good faith);
    2) the alleged retaliation is not real;
    3) there is no causal link between the disclosure regarding the law violation and the alleged retaliation.

40. The integrity whistleblower is not liable for the manner in which they obtained the information presented in the disclosure or for access to it, except for the situations when such gathering or access to information constitutes an offense.

41. The integrity whistleblower shall not be held liable for a disclosure of a law violation, provided that they had reasonable grounds to believe that the reporting or disclosure was necessary.

V. RESPONSIBILITIES

42. The Governor ensures the protection of integrity whistleblowers in accordance with the provisions of Article. 18 paragraph (3) of the Law No 82/2017.

43. The employees have the obligation to expressly refuse any attempt to involve them in acts of corruption, to warn, if possible, the person about the illegal nature of this attempt, and to promptly inform the Compliance Division about it, by one of the means provided in point 11.

44. The designated person ensures:
    1) the receipt, registration of internal disclosures and the performance of the necessary actions aimed at their proper examination;
    2) the confidentiality of the received information;
    3) the timely examination of the circumstances presented in the integrity alerts and the provision of information to the integrity whistleblower about the results of the examination according to the conditions set out in point 28;
    4) the transmission to National Anti-Corruption Centre or another competent authority of the information contained in the integrity alert if it meets the elements of a contravention or crime.

45. The designated person informs the Governor about the registration of the disclosure and the proposals regarding subsequent actions and about granting/withdrawing the status of integrity whistleblower and approval or refusal of the request for protective measures.

46. The designated person informs the integrity whistleblower:
    1) about the confidentiality of their identity being maintained throughout the examination of the integrity alert, except for the cases when the information communicated in the alert has been transmitted to the criminal investigation body;
    2) about the initiation of the examination of the information and circumstances stated in the integrity alert and the deadline for providing the results of the examination;
    3) about the withdrawal of the status of integrity whistleblower, if during the examination it is found that the concerned whistleblower does not meet the conditions provided in point 19;
    5) about the granting of protection measures, if such measures have been requested;
    6) about the result of the disclosure examination.

47. The designated person and the telephone line operator are obliged to maintain confidentiality by signing a declaration, which template is set out in the Annex 4.

VI. LIABILITY

48. Impeding, by any means, disclosures regarding law violations by the person designated to receive, record, and examine integrity alert entails disciplinary liability.

49. The performance of retaliatory actions against integrity whistleblowers, including against family members or persons close to the integrity whistleblower, entails disciplinary liability.

50. Failure to take measures to ensure disclosures regarding law violations, failure to respect the confidentiality of employees who disclose law violations and of the persons concerned in the disclosure, failure to ensure protection measures for integrity whistleblowers entails disciplinary liability.

51. Consciously reporting false information regarding law violations entails disciplinary liability.

52. The application of disciplinary liability does not exclude the application of other forms of liability provided by the legislation in force.

Annex 1

to the Regulation on the receipt, examination and resolution of internal disclosures on law violations within the National Bank of Moldova

INTERNAL DISCLOSURE ON LAW VIOLATION QUESTIONNAIRE

1. Employee's full name and contact details, including email address

____

____

2. Workplace, subdivision of the employee, position held

____

____

3. The employee's relationship with the employer (individual employment contract or legal relations based on other type of contract, civil legal relations, social service provision contract or other relevant information)

____

____

4. The professional context in which the information was obtained, details regarding the law violation

____

____

5. Provision of evidence/information confirming the law violation or reference to the methods enabling the verification of the disclosed information (if any)

____

____

6. Have you previously made internal, external, or public disclosures regarding this specific law violation? If yes, please provide details.

____

____

_____________ ____________________

(date) (*employee's signature*)

_____________ ____________________________

(date) *(signature of the designated person)*

- -

S T U B

The internal disclosure of a law violation is received by

____

(the first and last name of the designated person)

Registration number in the Registry of disclosures regarding law violations _____________

I declare that I know and understand the provisions of points 51 and 52 of this Regulation, the provisions of Article 29 paragraph (6) of Law No 165/2023 ______________________________________

Annex 2

*to the Regulation on the receipt, examination
and resolution of internal disclosures on law violations
within the National Bank of Moldova*

Registry of disclosures of illegal practices and integrity alerts

No.	The number and date of registration of the disclosure of the law violation	Description of the law violation	Name of the public/private entity, as applicable, of the subdivision/person concerned in the disclosure of the law violation	Whether or not the employee who submitted the disclosure is subject to retaliation at the workplace		Whether or not the employee who submitted the disclosure on the law violation is recognised as an integrity whistleblower	Whether or not the integrity whistleblower requested protection measures. Requested measures	Protection measures applied to the integrity whistleblower	Whether or not the disclosure on the law violation was forwarded for examination to other competent authorities. Date of transmission	Whether or not the disclosure on the law violation was forwarded for examination to the criminal investigation bodies and whether the employee has any procedural status	The name of the person who recorded the disclosure on the law violation, their subdivision
				Retaliation actions	The name and surname of the persons performing retaliation actions						

Annex 3

to the Regulation on the receipt, examination and resolution of internal disclosures on law violations within the National Bank of Moldova

REQUEST
for protection of the integrity whistleblower

The undersigned,____,
(name, surname)

employee within
____
____,
(indicate the title of the position and the division)

holder of the status of integrity whistleblower granted under:

☐ point 35 of *the Regulation on the receipt, examination and resolution of internal disclosures on law violations within the National Bank of Moldova*

dated ____________________, request the granting of the protective measures provided in Chapter IV "Protective Measures" of the Law No 165/2023

The following retaliatory actions have been taken against me in connection with the integrity whistleblowing submitted:
____
____
____
____
____
____
(expressly describe the retaliatory actions, as well as the name, surname and position of the persons who have resorted to retaliation actions)

In order to respect my rights and to cease the retaliation actions, I request the application of one or cumulatively some of the following protective measures:

☐ the transfer, while maintaining the specific activity, of the undersigned or of the person who performs retaliation actions

____
____
(indicate the name, surname and position of the person)

during the examination period of the protection request, to another subdivision
____
(indicate the name of the subdivision)

☐ the sanctioning the person who performed retaliatory actions in connection with the integrity alert or the disclosures regarding law violations

____
(indicate the name, surname and position of the person)

☐ cancellation of the disciplinary sanction, established by the employer as a result of a disclosure
____
____
____
(indicate the category of the applied sanction, the date of the sanction application)

Other details
____
____
____
(the protective measure requested by the integrity whistleblower)

I attach to this protection request the following documents/evidence that proves the retaliation actions performed against me:
1.____
2.____
3.____
4.____

Date/Signature

Annex 4

to the Regulation on the receipt, examination and resolution of internal disclosures on law violations within the National Bank of Moldova

CONFIDENTIALITY AND IMPARTIALITY STATEMENT

Hereby, the undersigned,

____

(last name, first name)

employed within

____

____,

(indicate the title of the position and the subdivision)

commits to ensuring the confidentiality of the information obtained during the performance of the duties assigned to me by the means of

____

(no. and date of the internal order)

in accordance with *the Regulations on the receipt, examination and resolution of internal disclosures on law violations within the National bank of Moldova (approved by the Executive Board Decision of NBM No 258 of 06.11.2025*) and to use them only for the purpose established by the legislation and not to disclose this information to unauthorised persons, including after the termination of related activities.

I declare that I am aware of the legal provisions regarding liability in case of breach of confidentiality obligations.

I undertake, in case of a conflict of interest, to comply with the legal regime on conflicts of interest and to submit the abstention declaration.

Date/Signature